

Michael N. Zachary, OSB #04120
Email: michael.zachary@klarquist.com
Michael P. Matesky II, *Pro Hac Vice*
Email: mike.matesky@klarquist.com
KLARQUIST SPARKMAN, LLP
600 University Street, Suite 2950
Seattle, WA 98101
Telephone: 206-264-2960
Facsimile: 206-624-2719

Scott E. Davis, OSB #02288
Email: scott.davis@klarquist.com
KLARQUIST SPARKMAN, LLP
121 SW Salmon Street, Suite 1600
Portland, OR 97204
Telephone: 503-595-5300
Facsimile: 503-595-5301

Attorneys for Plaintiff CollegeNET, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

COLLEGENET, INC.,
a Delaware corporation,

Civil No. 08-CV-601-BR

Plaintiff,

v.

THE COLLEGE NETWORK, INC.,
an Indiana corporation,

Defendant.

**PLAINTIFF COLLEGENET, INC.'S
MOTION FOR EXPEDITED
DISCOVERY AND EXTENSION OF
TIME TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS OR TRANSFER**

**EXPEDITED CONSIDERATION
REQUESTED**

**PLAINTIFF COLLEGENET, INC.'S MOTION FOR EXPEDITED DISCOVERY AND
EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS OR
TRANSFER**
Case No. 08-CV-601-BR

**MOTION FOR EXPEDITED DISCOVERY AND EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S MOTION TO DISMISS OR TRANSFER**

LOCAL RULE 7.1 CERTIFICATE: The parties have made a good faith effort through telephone and e-mail communications to resolve this dispute, and have been unable to do so. The College Network, Inc. ("TCN") opposes jurisdictional discovery and the associated extension of the briefing schedule on TCN's Motion to Dismiss or, in the Alternative, Transfer Venue proposed by CollegeNET, Inc. ("CollegeNET"). TCN has also indicated that it cannot state opposition or consent to CollegeNET's requests (a) that TCN be ordered to respond to written discovery regarding personal jurisdiction issues or (b) that discovery regarding personal jurisdiction issues not count against the limits set forth in the Federal Rules of Civil Procedure or Local Rules, until such jurisdictional discovery requests are served.

CollegeNET respectfully requests (a) that TCN be ordered to respond to written discovery requests regarding personal jurisdiction issues within 20 (twenty) days of service, (b) that discovery regarding personal jurisdiction issues not count against the limits set forth in the Federal Rules of Civil Procedure or Local Rules, and (c) that CollegeNET be allowed to file a response to TCN's Motion to Dismiss or, in the Alternative, Transfer Venue on or before October 15, 2008.

In light of the upcoming August 8, 2008, date for CollegeNET to respond to TCN's Motion to Dismiss or Transfer, CollegeNET also requests expedited consideration of this Motion.

**PLAINTIFF COLLEGENET, INC.'S MOTION FOR EXPEDITED DISCOVERY AND
EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS OR
TRANSFER**

Case No. 08-CV-601-BR

Respectfully submitted,

Dated: August 1, 2008

By: s/ Michael P. Matesky, II

Michael N. Zachary, OSB #04120

Email: michael.zachary@klarquist.com

Michael P. Matesky II, *Pro Hac Vice*

Email: mike.matesky@klarquist.com

KLARQUIST SPARKMAN, LLP

600 University Street, Suite 2950

Seattle, WA 98101

Telephone: 206-264-2960

Facsimile: 206-624-2719

Scott E. Davis, OSB #02288

Email: scott.davis@klarquist.com

KLARQUIST SPARKMAN, LLP

121 SW Salmon Street, Suite 1600

Portland, OR 97204

Telephone: 503-595-5300

Facsimile: 503-595-5301

Attorneys for Plaintiff CollegeNET, Inc.

**PLAINTIFF COLLEGENET, INC.'S MOTION FOR EXPEDITED DISCOVERY AND
EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS OR
TRANSFER**

Case No. 08-CV-601-BR

CERTIFICATE OF SERVICE

I hereby certify that on this date I filed the foregoing Motion for Expedited Discovery and Extension of Time to Respond to Defendant's Motion to Dismiss or Transfer with the United States District Court Clerk for the District of Oregon using the CM/ECF filing system, which will automatically notify the following counsel of record of this filing:

Jonathan G. Polak
jpolak@taftlaw.com

Trent J. Sandifur
tsandifur@taftlaw.com

Edward A. Merrill
Merrill_law@hotmail.com

DATED: August 1, 2008

Leslie Boston
Leslie Boston

**PLAINTIFF COLLEGENET, INC.'S MOTION FOR EXPEDITED DISCOVERY AND
EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS OR
TRANSFER**

Case No. 08-CV-601-BR